So much good work is <u>already</u> being done that I find it appalling that so much mindless fare such as *Dumb and Dumber* clutters the public airwaves. <u>Even the title</u> of such a show sends an extremely negative message to its viewers! While I have personally not seen this show, the main reason is that the title implies that the content is going to try to "out-dumb" itself on a weekly basis. Is this really the direction our country wants to go? I hope not.

I know about the shopworn phrase: "but these kinds of shows are the ones that bring in all the money". Fine. But I think that if we can find our way to eliminating cigarette advertising from television so that eventually our nation's physical health will improve; and restrict, but not completely censor, adult programming such as *NYPD Blue* to certain time periods, why can't we <u>EXPAND</u> the <u>mandatory</u> number of hours devoted to educational programming? Why must television constantly pander to the <u>lowest</u> common denominator?

I believe that it is time for organizations such as yours to stand up to the billion dollar entertainment networks using the <u>public</u> airwaves and simply say: "We have done our country a disservice by wasting, through <u>non</u>use, the vast power of radio and television. It is now time to pay, and pay dearly, for our past mistakes. From here on, <u>more</u> time, not less <u>will</u> be devoted to programming that exemplifies the behaviors we, as a nation, expect from our citizens. And if someone asks "What behaviors?", all they have to do is look at the laws we are expected to follow as American citizens.

I also suggest that if someone is looking for specific guidelines as to the type of programming needed to improve children's, and <u>adult</u> education for that matter, then they should read Robert Fulghum's book <u>All Ever Learned I Learned in Kindergarten.</u>

I hope that your organization can begin to provide the framework for a broadcast environment that <u>encourages</u> rather that prevents and discourages quality television. So many examples of high quality shows are already available, both "golden oldies" as well as new ones, that in my opinion, it borders on criminal negligence <u>not</u> to do everything possible to maximize the most positive learning environment possible, for our nation's children as well as our adult selves.

Sincerely,

Kaymand W. Koch



EDWARD J. (TED) KOPLAR PRESIDENT (314) 454-6422 FAX: (314) 454-6445

DOCKET FILE COPY ORIGINAL

September 11, 1995

Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

SEP 1 4 1975

RE: FCC DOCKET NO. MM Docket, No. 93-48

Dear Sir or Madam:

I am writing to comment upon the FCC's Notice of Proposed Rulemaking which contemplates tightening the rules for implementation of The Children's Television Act, including further restricting the definition of educational and informational children's programming and the possibility of imposing on over-the-air broadcasters numerical "quotas" for such programming.

I am writing to you as a broadcaster who has been involved in children's programming since our station "signed on" in 1959. I am also writing as a concerned father of five children ranging in age from six to seventeen.

It seems ironic that the Commission should be considering such actions in this era of <u>de</u>-regulation and at a time when the very concept of "quotas" is being questioned and the notion of government-imposed numerical quotas on private businesses has fallen into disfavor.

It is my view that focusing upon <u>numerical</u> quotas of any kind, whether that be hours of programming per week or number of commercial minutes, undermines the goals of the Commission and the original intent of The Children's Television Act because it places the emphasis on the <u>quantity</u> of programming rather than on the <u>quality</u> of the content of that programming.

Thus, while a decision by the Commission to impose numerical quotas would unquestionably succeed in placing undue regulatory burden on broadcasters, such quotas provide no assurance that more <u>quality</u> programming will be available to children. Indeed, in some instances, such quotas may have the opposite effect. Commercial broadcasters are in a unique position: as licensees of the FCC, they are sworn to operate in the public interest and to adhere to the regulations and guidelines established by the FCC; they are also private businesses whose very survival depends upon their ability to make a profit.



Secretary of The Federal Communications Commission September 11, 1995 Page 2

I would respectfully ask the FCC to be mindful of the delicate balance which commercial broadcasters must maintain between regulatory compliance and profitability.

To put broadcasters in a position where they may be forced to air inappropriate or poor quality children's programming simply to comply with a numerical quota is counter-productive. We are already losing young viewers to Cable and, since it is difficult for a locally-owned Independent station such as ours to produce children's programming "slick" enough to compete with the likes of such morally-uplifting Cable icons as "Beavis and Butthead" and "Ren and Stimpy," the ultimate consequence of numerical quotas or of additional restrictions on program content may be to make Cable a more attractive choice for our young viewers.

Historically, advocates of government-imposed numerical quotas argued that such quotas are necessary because businesses will not self-regulate. However, since it is my understanding that there has been more than a 100% increase in the amount of educational and informational children's programming broadcast since passage of The Children's Television Act, it is clear that in this case, the traditional argument in favor of numerical quotas has absolutely no validity.

I'd like to describe some of the things we are doing in the areas of children's programing and community outreach at KPLR-TV in St. Louis.

Throughout its 36-year history, KPLR-TV has been recognized as THE family station in St. Louis, and we take great pride in that fact. Beginning in the 1960's with our production of the popular and successful "Captain 11's Showboat," KPLR-TV has maintained an ongoing commitment to the production of original programming geared toward educating, informing, and entertaining young viewers in a positive manner. We believe that KPLR-TV has always performed credibly, responsibly, and "in the public interest" with respect to the children's programming we produce and broadcast and we will continue to do so as long as we are on the air, with or without additional FCC regulations.

Membership in our Kids' Club, ST. LOUIS 11 KIDS, is free to all children through 12 years of age and total membership currently stands at 145,000. Members receive a Card which entitles them to free or discounted admissions to various attractions such as The Magic House and The St. Louis Science Center. Four times a year, all members receive in the mail our award-winning Kids Club Newsletter which contains informative articles, creative and thought-provoking activities, and a variety of contests, games, and puzzles which are both educational and fun. Also included is an

Secretary of The Federal Communications Commission September 11, 1995 Page 3

article written especially for parents titled, "A Pause for Parents."

The KIDS' CLUB CREW consists of three young adults who serve as "on air" talent in our children's programming blocks and who present a school and camp program to area kids from kindergarten through sixth grade. This program, which focuses on development of a positive attitude and positive self-esteem, is presented a minimum of once a week to an average audience of 400 children. Among the KIDS' CLUB CREW'S many community outreach actitivies, they also work with the St. Louis Public Library in encouraging kids to read and are involved in various activities with the children in the two large Children's Hospitals in our community.

The CREW'S "on-air" appearances consist of eleven interstitial segments per day. These include "Tip Time" which is a special tip on safety, health, or nutrition; "Role Call," in which each audience member tells a little about himself; and "Mary, Mary" which features a senior citizen who tells kids about "the good old days" and ends each segment with a positive message.

In addition, KPLR-TV created and supports TEAM 11, a group of talented singers and dancers from local high schools and colleges who are also outstanding students, athletes, and school leaders. TEAM 11 participates in programs, spots, and PSA's broadcast on KPLR-TV and performs at various schools, community fairs, charitable benefits, and professional sporting events throughout the year. The members of TEAM 11, with their fresh good looks, talent, enthusiasm, and upbeat message have won the hearts of kids and adults alike and are positive role models for young people throughout this area.

I trust that the foregoing demonstrates that KPLR-TV takes seriously its responsibilities to the young people in the St. Louis market. We believe that we are fulfilling our responsibilities to our young viewers now, and we will continue to develop creative and relevant ways to engage, educate, inform, and entertain them in positive ways in the future, without the imposition of additional government regulations.

Speaking as a father, I resent and deplore the content of shows such as "Beavis and Butthead," "Ren and Stimpy," and "The Simpsons." These shows exploit kids by appealing to their fascination with "dirty" words, by promoting the idea that it is "cool" to make jokes about penises and vaginas, and by making it seem somehow acceptable to cultivate disrespectful and demeaning attitudes toward the family unit and toward family relationships.

Secretary of The Federal Communications Commission September 11, 1995 Page 4

Although I oppose censorship and acknowledge the argument of defenders of the "Beavis and Butthead" genre who contend that the fault lies not in the programming, but in the lack of parental supervision, their argument fails to take into account the millions of latchkey kids who are a fact of our current lifestyle.

As long as the FCC and the Children's advocacy groups who are seeking additional restrictions on commercial broadcasters choose to look the other way while the reprehensible moral bankruptcy epitomized by the "Beavis and Buttheads" and the "Ren and Stimpys" of the Cable world continue unchallenged and unabated, I consider any effort by the FCC to impose additional children's programming regulations unilaterally on over-the-air broadcasters unwarranted, excessive, and unfair. If the FCC Commissioners vote to proceed with this Rulemaking, I envision a frightening scenario in which the imposition of additional regulations on the amount and content of children's programming restricts broadcasters' creative options to the extent that young people are eventually "turned off" by programming on broadcast television and seek refuge in the vacuous world where Beavis and Butthead are the role models.

Over-the-air broadcasters have already overwhelmingly demonstrated that they are living up to the goals and the spirit of The Children's Television Act, as originally enacted. Any efforts at further reform or regulation undertaken by the FCC should be directed at new and different targets -- targets in that segment of our industry where sub-standard, morally-deficient children's programming is routinely produced and broadcast and where insulting and offensive programming aimed at young people is standard fare.

Thank you for the opportunity to comment on the Proposed Rulemaking to be considered under FCC Docket Number: MM Docket, NO. 93-48.

Sincerely,

Edward J. Koplar

President and Chief Executive Officer

KOPLAR COMMUNICATIONS, INC.

EJK/bwh

September 10, 1995 BOCKET FILE COPY ORIGINAL FCC MAIL ROOM Federal Communications gton DC 20554

1527 St. Paul Ave. Apt. 11

### **RECEIVED**

1 4 1995

Geoffrey W. Bromfield Jr. 2550 6th Avenue **DOCKET FILE COPY ORIGINA** Merced, California 95340

FCC MAIL ROOM

9/1/95

(t)

To Whom It May Concern:

Re. MM Docket 93-48 I am outraged at the blatant disregard for intrinsile+ basic immorally of the trash of non-sense on television. I teach 6th grade science. Yoshof my 11 year old shadents are keenly aware of Kelly Brendy & the latest episode of Day watch " yet don't know that humans are ever vertebates. In no prude, and lift of cetter on most social issues but the trash on "Geraldo" + Riki Lake " is totally unreal. Imagine if a trul alien visited earth & watched TV to guage our culture - we would not be worthy of contact. The Fox network (owned by a distant relative, incidenty) should have it's license revoked! This outfit fails to seve the public intest! Sace, once in a while there is something write saing ! "Nova, base hall by Ken Burns + the rest of PBS whose funding is at rock + yes I pay my fair share dung pladge week. AME is good too as is Turner Broadcasting. MTV - no way do I evan let Snoop Doggy - Day in my house - indited or otherwise. As the divocal father of of I carefully monitor what my children (9 to 18) watch. My Ex Sin afraid is not concerned + she thinks Manuel with

Geoffrey W. Bromfield Jr. 2550 6th Avenue Merced, California 95340

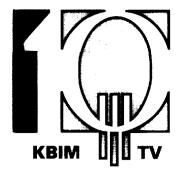
Children is a real host.

I'm afraich that I agree with the Speaker of the House of Bob Dole on this one: T.V. fortuned part exploits all that pure crap, bonal, violent, sick + desgresting.

You let me tell you how I really feel!

Out raged!

Suffy W. Bromfatt , (),



# RECEIVED SEP 1 a 1995

#### **FCC MAIL ROOM**

September 12, 1995

DOCKET FILE COPY ORIGINAL

Secretary
Federal Communications Commission
1919 M St., NW
Washington, D.C. 20554

Dear Secretary:

I'm writing to oppose the adoption of new rules concerning the Children's Television Act (MM Docket No. 93-48).

Responding to the Children's Television Act, broadcasters have significantly increased educational and informational programming for children. We get no credit for short segment programming or the numerous community events we sponsor benefiting children. We are responsible and we are providing more and better educational and informational programming for children. We don't need the bureaucracy associated with new rules and quotas. It will only serve to bog down the process when our resources could be better directed otherwise at achieving the desired result.

Thanks for your consideration.

pay Me Mai

Sincerely.

Gary McNair Station Manager

cc: Chairman Reed Hundt
Commissioner James Quello
Commissioner Andrew Barrett
Commissioner Susan Ness
Commissioner Rachelle Chong

MOOL WILL OF Bunday Suptember 10. 1995

Suptember 10. 1995 Dear Sire. CENTIOIH
When hav all the quality, educational insperational and wholesome. Children TV gone? Our young adults and children tane very lettle to choose from if they are to watch warthwhile programs. Velevision could be such a help and left our country from many of its problems. Thatead it glarific setuations, actions, people. and life styles that Lave to Ornal Standards or offer any real lessons for living. When will an find a cure for TV: plague of facteless programing Seneerely. Skary L'llew Wilson D 3265 Southdale Di Kettering O. 45409

REC-IVED SEP 1 4 1995

Sept. 10, 1995

JEGENAL BOOM referred of the Secretary Commission 1919 M Street n. 21. Washington D.C. 20554 DOCKET FILE COPY ORIGINAL Dear Sir: a recent article in U.S hews and Wild Report dated Sept 1/1995 entitled Dole Kids T. V. ned fixing. I would say most emphatically yes! The networks, especially under Regart murdock (FOX) has brought the greatest debasement to T.V in its history, I follyword mogul Valenti and hundoch are two of the most dangerous men en Gmerica-fristing their putard entertainment on people. How do these people character such control under the gruse of free speech, whereas the general public has no say as to the Content that is blasted forthe daily? Of he speaks for ins? These people who are advocating their free speech rights are ropedly destroying the fobile of our Louety with their shows on the about Sannhy Ser Diolence, gloupping Repsinger, guns, wife battering and general immorality. Here shows, in whatever form, assessheer Two lence and pornagraphy. They have destroyed the beautiful innounce of our small Children who with sorp yours all

toy, watch men batter romen or their

wires or use druge, Tweence + grim

All this is permissible because it is called the right of free speech which is just a facile to justing the debasement of life as we once knew in a wholerome manner. forces which could enger into Anarchy. This Country is in jeaparty of falling from within. Hatred es enviewing, disreged for government offered is rampant, Racism, Galtas, teen age goings with guns, Turlence in the form bittering unner, child abuse and neglast by teen age mother is rampant and everyoneas becoming oflows. Then least their willow gut frends, rope, disresport and and demean (elderly people whom Holey Barborn recently Called members of the Poverty Lebby) It hend man of this statute insults the elderly on "meet the trees" it is time to set up and tobe notice. The was cruel. The don't need Censorship. We need foundle men and women of character who are accountable to themselves, our Children and the welfare of our Country. We need Careful enjoycement and for new lows, The esa new Era and permissiveness is flagrant. He count as parents. Completely Control who to an Chedren were no matter what the advanter of

for speech say. He are not with our Children 24 hours a day. They are exposed to outsite influences in school, ather perples homes, playground etc. Decency has to start at the Some of these harendous rule influence. 1. V and dollywood are swonger of immorally, violence and running set which deboses men, dierespede commen and encourage Crime and drugs. The Source of this entertainment must tole responsibility for destroying the fabrice John Secrety, we are in Jeopardy of falling from within. The handwelling is on the wall and someone with a Conssience must slyp forward and say - 6 nough! It is time to protest the desent people of the Country who made it what it once was Gmerica the Beautiful. most Dinurely. Getty & Jones. P.S. & the Senate has its Ethics Committee and can expel its members for improper Conduct, it is time T. V and Hollywood should have an Ethics Committee with representalives from Dov, Gradustry and Community. Of these mogule use our arrivares, we should Condone what they offer by following guile lines.

#### RECEIVED

From:

Scott H. Schulke <schulke1@netcom.com>

To: Date: A16.A16(Kidstv) 9/14/95 1:59am

Sublect:

Comments on Proposed Rule

SEP 1 4 1995

FEDERAL COMMUNICATIONS COMMISSION
OFFICE AND CONTRACTORS

Secretary

Federal Communications Commission 1919 M Street, NW Washington, D.C. 20554

DOCKET FILE COPY ORIGINAL

re: Comments on Childrens' Educational
Television - Proposed Rule

To Whom it may concern:

I welcome this opportunity to make the following comments on the FCC proposal on Childrens' Educational Television.

My main interest is in requiring television broadcast licensees to create and air more "high quality" programs for minor children as a fundamental requirement of their licenses. "High quality" educational programs are those such as "Carmen San

Diego," "Sesame Street," "Marty Stouffer's Animal Kingdom" etc.

Watch WETA, KQED, WGBH or WTTW any day of the week and you will find the type of television that teaches children respect for other people, their cultures, our environment and imparts basic skills etc. I'll keep it simple: Public Television is Television.

We have been entertaining ourselves to death with endless T.V. violence. I don't mind non-exploitive programs with sexual content, but we must establish a forum for more high quality non-violent programming. You know the T.V. Broadcast industry much better than I do so use your judgement, but phase in some type of meaningful broadcast license requirement, like each station must broadcast educational programs for children 5 to 15 hours a week or something on the order of 15% of entire program hours. False sports team garbage should never count as educational T.V. Don't allow the Broadcast industry to define what "educational" means.

Thank you for your consideration. This could make a meaningful improvement in our society.

Scott H. Schulke 3040 Idaho Ave., NW #311 Washington, D.C. 20016-5405

(202) 244-7524 Fax (202) 244-3519 Voice

No. of Orgins rec'd\_\_\_\_\_\_ Ust A 5 0 0 E

## RECEIVED

SEP 1 4 1995

From:

Cecilia Dialynas <dialyncm@sce.com>

To: Date: Subject: A16.A16(kidstv)

9/14/95 4:29pm commercial tv DOCKET FILE COPY ORIGINAL

FEDERAL COMMUNICATIONS COMMISSION

I have a 7-year old daughter who has been raised on public tv. I rarely watch commercial tv and could not list any popular shows besides the evening news. My mother, on the other hand, watches a lot of commercial tv, and often times will call me to have my daughter put on some children's show she thinks my daughter may like. I have noticed that even if the show is interesting, if there is a lot of suspense or violence, my daughter will not want to watch it. I've also noticed that the commercials really distract her. Often, she will become engrossed in the show, then a commercial break will come. By about the 3rd commercial, she will lose patience and shut the tv. I think the commercials ruin the continuity for her, especially as she is not used to commercials at all. I've also noticed that my daughter prefers the content of the programs on PBS to the ones on commercial tv.

Oftentimes, when my mother calls with a recommendation, my daughter will ask to shut the tv because she doesn't think the show is interesting. I've even noticed that she prefers the Lawrence Welk show to many of the commercial tv children's specials my mother has recommended on Saturday or Sunday nights around 7PM!

I am happy with children's programming on PBS. Cecilia Dialynas So CA Edison Co (818) 302-0833

No	्र 0, च ७ <b>rec'd_</b>	/